UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION No. 2:12-md-02323-AB

MDL No. 2323

Hon. Anita B. Brody

Kevin Turner and Shawn Wooden, on behalf of themselves and others similarly situated,

Plaintiffs,

Civil Action No.: 14-cv-00029-AB

National Football League and NFL Properties LLC, successor-in-interest to NFL Properties, Inc.

v.

Defendants.

Hon. Anita B. Brody

THIS DOCUMENT RELATES TO: ALL ACTIONS

CLASS COUNSEL'S SUPPLEMENT TO RESPONSE TO MOTIONS TO DISCIPLINE OR DISMISS SPECIAL MASTERS AND AUDITORS

On April 21, 2021, Class Counsel submitted his response (ECF No. 11340) to the motions (including a "supplemental" motion) to discipline or dismiss the Special Masters and Auditors, filed by Tim Howard (also known as Phillip Timothy Howard) of Howard & Associates ("Howard") (ECF Nos. 11324, 11328-29, 11337).

Class Counsel's response noted Howard's history of Florida Bar disciplinary charges. ECF No. 11340 at 2 n.2. Class Counsel wishes to update the Court concerning information that has since come to his attention. In a report received by the Florida Supreme Court on April 23, 2021, a court-appointed referee has now recommended Howard's permanent disbarment.

A copy of the referee's report is annexed hereto as Exhibit 1.

Dated: April 29, 2021

Respectfully submitted,

By: /s/ Christopher A. Seeger
Christopher A. Seeger
SEEGER WEISS LLP
55 Challenger Road, 6th Floor
Ridgefield Park, NJ 07660
Telephone: (212) 584-0700
cseeger@seegerweiss.com

CLASS COUNSEL